Calpers June Risk Report

In September 2010, the CalPERS Board of Administration authorized the creation of the Office of Enterprise Risk Management (OERM) to enhance risk intelligence and decision-making at CalPERS. As a key part of fulfilling this role, the OERM has worked with Executive Staff and senior management from across the organization to conduct an enterprise risk assessment and create the following risk report. This report is the first in an ongoing series designed to promote transparency, increase risk awareness, and improve risk management at CalPERS. It demonstrates CalPERS focus on areas of management concern, and ensures the most critical risks are fully recognized and promptly addressed.

The risk dashboard shows the overall risk profile broken down into strategic. operational, financial/reporting, ethics/legal/compliance, and investment categories. Under each of these areas, several subcategories represent the aggregate rating of many underlying specific risks. A separate report for each category describes the current state of the risk and planned mitigation strategies, many of which are major initiatives from the 2011-12 Business Plan. These specific reports are still in draft status, as additional mitigation strategies not included in the Business Plan are not yet reflected. Ongoing reports will show changes in the risk profile over time and management's progress in risk mitigation activities.

California Public Employees' Retirement System					
Enterprise Risk Management - Residual Risk Report					
Strategic	Operational	Financial / Reporting	Ethics / Legal / Compliance	Investments	
Health Programs	Business Planning	Cash Management	Fraud	Investment Policy	
HMO and PPO plans are adequately funded and CalPERS is able to offer cost-effective, accessible, quality health care options.	Business Planning process is effective in creating relevant strategies and efficient in implementation and monitoring.	Accurate projection of cash sources and requirements, including effective management of receivables.	Protection of CalPERS assets, integrity and credibility through effective detection and prevention and investigation capabilities.	The Total Fund is invested consistent with the approved asset allocation policy targets and ranges and all other policy parameters.	
Long Term Care Program	Organization	Financial / Administrative Controls	Compliance with Laws and Regulations	Active Risk	
Long Term Care programs are sufficiently funded and third party vendors provide services required.	An aligned, effective organization structure which is adaptive to changing requirements.	Effective control policies and design, implementation and management of controls for decision making, and use of assets, including appropriate segregation of duties and delegation of authority.	Compliance with all relevant laws, rules and regulations, including regulatory reporting, the Bagley-Keene Open Meeting Act, and privacy laws (e.g., HIPAA).	Active risk is measured by expected and realized volatility of portfolio returns compared to benchmark returns for the Total Fund and asset classes. Active risk is within established limits.	
Pension Funding and Programs	Procurement and Contract Management	Fiscal Planning	Policy Compliance	Concentration	
Pension plans provide retirement security for members which are affordable and attractive to employers, maintaining low volatility in contributions and sufficient funding levels.	The process of cost effectively and efficiently acquiring goods or services and managing contracts consistent with applicable laws, regulations and CalPERS policies.	Effective budgeting and planning which provides appropriate financial resources for the organization to meet its objectives.	Compliance with all CalPERS policies e.g., operational, security, confidentiality, records management, and e-Discovery.	Total Fund concentrations across asset classes including industry, country, currency and security asset type comparing portfolio and benchmark weights to identify significant active weights.	
Actuarial ⇒	Business Continuity Management	Reporting	Ethical Conduct	Leverage ⇒	
Actuarial assumptions serve as reasonable forecast of actual economic and demographics conditions. Actuarial methods are consistent with industry standards.	Effective planning for recovery and business continuity in the event of a disaster, hazard situation, or other business interruption.	Financial and management reporting with integrity which meets management's needs for decision making and legal and statutory requirements for disclosure.	Adherence to CalPERS standards of conduct, personal trading policy, and conflict of interest policies.	Each asset class is in compliance with leverage policies and impact of portfolio leverage is understood.	
Governance / Leadership	Performance Management	Administrative Accounting	Legislative / Regulatory	Counterparty Exposure	
Effective delegations, policies and procedures which result in timely, effective decisions and guide the System to meet its strategic objectives. Includes tone at the top.	Ability to effectively and efficiently meet business objectives, including identification of appropriate business metrics, regular reporting and monitoring, and measurable improvement plans.	Administrative accounting is accurate and complete, performed in compliance with all applicable laws, rules, and regulations. Provides for appropriate reporting and sound decision-making.	Regulatory changes do not impede CalPERS ability to accomplish objectives. Training and governance processes adequately mitigate legal risks.	Ability of counterparties to meet their contractual obligations is measured and managed.	
Strategy and Policy	Operational Controls	Investment Accounting		Investment Risk Management	
Effective strategies and policies which anticipate changing requirements and result in the ability to meet CalPERS vision, mission, goals and objectives.	Ensuring the proper level of operational controls is in place to safeguard CalPERS campus, mail, and equipment from damage or theft.	Investment accounting is accurate and complete, performed in compliance with all applicable laws, rules, and regulations. Includes related custodian accounts, pooled investments, valuations, and performance measurement.		Measurement, management, monitoring and reporting of investment risk and returns. Includes adequacy of resources, tools and governance structure to measure and manage risk.	
Stakeholder Relations	Technology / Systems Management			Liquidity	
Effective communications and relationships with key stakeholders which maintain a high level of confidence in CalPERS and ensure greater success at achieving objectives.	Ability to provide a highly reliable, secure technology infrastructure that meets the information needs of CalPERS.			Projected amount of liquidity relative to anticipated requirements and ability to fund current requirements without resorting to premature asset sales.	
	Customer / Member Service			Investment Controls	
	Ability to meet and exceed the service expectations of members and employers.			Investment control framework in place to effectively manage risk, minimize fund expenses, provide for safekeeping of assets, and operate fund within context of all relevant legal requirements.	
	Human Resources Management			Investment Technology Systems	
	Maintaining an adequate, knowledgeable workforce with sufficient training and skills to meet organizational objectives. Includes hiring and succession planning and labor relations.			Investment technology systems reliably provide accurate, relevant data in a secure manner and support the operations and accounting for investment funds.	

Agenda Item 3c – Attachr California Public Employees' Retirement System				
Enterprise Risk Management - Residual Risk Report				
Strategic	Owner	Current State	Mitigation Strategies	Completion Date
Health Programs				
HMO and PPO plans are adequately funded and CalPERS is able to offer cost-effective, accessible, quality health care options.		PPO and HMO funding is at an acceptable level. Several pilot programs are underway to ensure costs are contained.	Provide continuous monitoring, analysis, and impact response on reform proposals Conduct two health care delivery studies	December 2011
Long Term Care Program				
Long Term Care programs are sufficiently funded and third party vendors provide services required.	Deputy Executive Officer, Benefit Programs Policy and Plarning	Although premium increases have improved the funding level, Long Term Care liabilities still outweigh assets, resulting in a deficit.	Continue scheduled premium increases Negotiation of Long Term Care provider	
Pension Funding and Programs				
Pension plans provide retirement security for members which are affordable and attractive to employers, maintaining low volatility in contributions and sufficient funding levels.	Deputy Executive Officer, Benefit Programs Policy and Plarning	The funding ratio is at approximately 71% and additional contribution volatility or poor investment performance could cause considerable strain for employers.	Improve investment performance / implement enhanced portfolio risk management Promote the enactment pancial market reform Establish a penalty policy and research function Publish two etirs and security issue papers	March 2012
Actuarial				
Actuarial assumptions serve as reasonable forecast of actual economic and demographics conditions. Actuarial methods are consistent with industry standards	Chief Actuary	Though currently operating within actuarial standards, CalPERS is conducting a review of assumptions and methodologies to assess associated risk and volatility impacts on employer contributions.	Develop recommendates on risk pooling improvements Revir y economic actual assumptions Coulout Board workshot July 2011	June 2012
Governance / Leadership				
Effective delegations, policies and procedures which result in timely, effective decisions and guide the System to meet its strategic objectives. Includes tone at the top.	Chief Executive Officer	CalPERS continue to take a sessive steps to implement access that strengthen the page on fund's buntability and pages, and its sure full transparency.	mplete Board governance project and implement recommendations greater accountability for audit findings rohibit payment of placement agent fees from partnership assets Complete implementation of the organizational structure changes Support pending legislation on gifts and post-employment restrictions Complete implementation of special review recommendations	June 2012
Strategy and Policy	-			
Effective strategies and policies which anticipate changing requirements and result in the ability to meet CalPERS vision, mission, goals and objectives.	Chief Executive Officer	Over the past of years, performance in pensation, and budget processes, resulting in more toordinated a lategy and policy.	Develop Policy and Thought Leadership function Establish and staff Enterprise Strategy function Publish retirement security issue papers Expand aligned planning process to 3-5 year timeframe	March 2012
Stakeholder Relations				
Effective communications and relationships with key stakeholders which maintain a high level of confidence in CalPERS and ensure greater success at achieving objectives.	Deputy Executive Officer, External Affairs	CalPERS is developing a formal program to monitor and respond to stakeholder concerns, and to measure the effectiveness of CalPERS communication strategies.	Conduct Stakeholder Relations risk assessment Implement a strategy that combines marketing efforts across the organization	June 2012

California Public Employees' Retirement System				
Operational	Enterprise Risk Management - Residual Risk Report Owner Current State Mitigation Strategies Completing			
Operational	Owner	Current State	Mitigation Strategies	Completion Date
Business Planning				
Business Planning process is effective in creating relevant strategies and efficient in implementation and monitoring.	Deputy Executive Officer, Operations and Technology	CalPERS has recently completed aligning business planning processes with budgeting and performance compensation practices. Further improvements could be made in streamlining the process and expanding the timeframe to take a more strategic approach.	Establish and staff Enterprise Strategy function Expand aligned planning process to 3-5 year timeframe Develop and implement improved performance metrics	December 2011
Organization				
An aligned, effective organization structure which is adaptive to changing requirements.	Chief Executive Officer	CalPERS has implemented a new organizational structure to ensure alignment with new PSR system and changing environment.	Complete implementation of the organizational structure changes	December 2011
Procurement and Contract Management				
The process of cost effectively and efficiently acquiring goods or services and managing contracts consistent with applicable laws, regulations and CalPERS policies.	Deputy Executive Officer, Operations and Technology	Contract workout session was recently completed, in which several contracting processes were enhanced. Sufficient Board and Executive attention exist to ensure proper contract management.	Complete review of contacting process and implement recommendations	
Business Continuity Management				
Effective planning for recovery and business continuity in the event of a disaster, hazard situation, or other business interruption.	Chief Risk Officer	Data is safe from loss, but restoration of IT services could be 4-6 months, depending on discontinuous.	Co lete phased implementation of my CalPERS	April 2012
Performance Management				
Ability to effectively and efficiently meet business objectives, including identification of appropriate business metrics, regular reporting and monitoring, and measurable improvement plans.	Deputy Executive Officer, Operations and Technolog	Many areas hat quality promance is Same areas may need additional metric revisit to existing parics.	Develop and implement improved performance metrics	April 2012
Operational Controls				
Ensuring the proper level of operational controls is in place to safeguard CalPERS campus, mail, and equipment from damage or theft.	Deputy Executive Officer, Operations and Technology	But the area mail security has been tightened in recent months. Fully importanting the building security policy could further reduce the risk of potential damage or theft.	Complete implementation of the building security policy	June 2012
Technology / Systems Management				
Ability to provide a highly reliable, secure technology infrastructure that meets the information needs of CalPERS	Assistant Executive Officer, Information Technology Services	Discrepancies in data between various systems causes concern over data integrity. Implementation of PSR includes considerable operational, technology, and security risks. Deployment of new technologies, e-discovery, and new business applications may introduce new technology risks.	Implement the 2011 Information Security Strategy Implement instant messaging, mobile endpoint, and malicious code policies Test PSR information security Adopt policies and procedures to address the risk of sharing confidential information Perform ERP solution analysis	June 2012
Customer / Member Service				
Ability to meet and exceed the service expectations of members and employers.	Deputy Executive Officer, Customer Services and Support	Allocating resources to PSR may cause increased backlogs and impede ability to meet established customer service response times.	Complete phased implementation of my CalPERS	April 2012
Human Resources Management				
Maintaining an adequate, knowledgeable workforce with sufficient training and skills to meet organizational objectives. Includes hiring and succession planning and labor relations.	Deputy Executive Officer, Operations and Technology	Human Resources effectiveness could be improved through the use of an automated system. Increasing retirements of key staff heighten the need for robust succession planning and talent management efforts.	Develop and implement a leadership mentoring program Add required knowledge transfer language to consulting services contracts Enhance ability to recruit, develop, and retain a highly skilled team Reduce consultant services	June 2012

		California Public Employees' Re	etirement System	Agenda Item 3c – Attachment 1
Enterprise Risk Management - Residual Risk Report				
Financial / Reporting	Owner	Current State	Mitigation Strategies	Completion Date
Cash Management				
Accurate projection of cash sources and requirements, including effective management of receivables.	Chief Financial Officer	Could improve oversight of key cash management functions. Need end- to-end process for cash management that includes both administrative and investment cash flows to manage fund liquidity.	Support legislation to establish and compensate the CFO position Implement the function of Chief Financial Officer Develop end-to-end cash management process and systems	June 2012
Financial / Administrative Controls				
Effective control policies and design, implementation and management of controls for decision making, and use of assets, including appropriate segregation of duties and delegation of authority.	Chief Financial Officer	Financial controls in certain program areas are not yet sufficient.	Develop and implement accounting action plan	
Fiscal Planning				
Effective budgeting and planning which provides appropriate financial resources for the organization to meet its objectives.	Chief Financial Officer	Budgeting and resource planning is currently done well.	Perform ERP solution analysis	
Reporting				
Financial and management reporting with integrity which meets management's needs for decision making and legal and statutory requirements for disclosure.	Chief Financial Officer	Although there are outstanding requests for different reports, information required by law and statute is currently reported a tately and on time.		
Administrative Accounting				
Administrative accounting is accurate and complete, performed in compliance with all applicable laws, rules, and regulations. Provides for appropriate reporting and sound decision-making.	Chief Financial Officer	Administrative accompliance functions are being certified under the incompliance functions are being certified under the incompliance function and the internal control fractions. New methodology were being published to gain evaluate, and monitor financial data.	create the Financial Office and CFO function Implement the accounting action plan	
Investment Accounting				
Investment accounting is accurate and complete, performed in compliance with all applicable laws, rules, and regulations. Includes related custodian accounts, pooled investments, valuations, and performance measurement.	Chief Financial Office	Respointify for its street as services estment and the custodian bank. Clear roles and responsitions are established and processes strengthened for reconcilians, valuates, performance measurement, and fund structure accounting systems could be used more efficiently to establish a clear book of record.	Create the Financial Office and CFO function Enhance Investment Office systems and controls Implement the accounting action plan	June 2012

California Public Employees' Retirement System Enterprise Risk Management - Residual Risk Report				
Ethics / Legal / Compliance	Owner	Current State	Mitigation Strategies	Completion Date
Fraud				
Protection of CalPERS assets, integrity and credibility through effective detection and prevention and investigation capabilities.	Chief Risk Officer	The personal trading policy and controls to prevent internal fraud could be strengthened.	Implement personal trading policy Establish investment policy monitoring Enhance Investment Office systems and controls	June 2012
Compliance with Laws and Regulations				
Compliance with all relevant laws, rules and regulations, including regulatory reporting, the Bagley-Keene Open Meeting Act, and privacy laws (e.g., HIPAA).	Chief Risk Officer	Comprehensive review of laws, rules, and regulations is warranted to ensure policies are aligned and up to date.	Implement personal trading policy	
Policy Compliance				
Compliance with all CalPERS policies e.g., operational, security, confidentiality, records management, and e-Discovery.	Chief Risk Officer	Policies throughout the enterprise are generally effective. However, there is a lack of standardized policy and compliance controls regarding electronic records and e-discovery.	Implement the 2011 mation Security Strategy	
Ethical Conduct				
Adherence to CalPERS standards of conduct, personal trading policy, and conflict of interest policies.	Chief Risk Officer	New policies are und someoned to clarify and streng and CalPERS overall code of adduct.	olement personal trading policy dish investment policy monitoring Enhance Investment Office systems and controls	June 2012
Legislative / Regulatory				
Regulatory changes do not impede CalPERS ability to accomplish objectives. Training and governance processes adequately mitigate legal risks.	General Counsel	Significant paid ion refuse legislation under consideration. Potential changes to 0 B pension accounting methodology.	Monitoring proposed legislation Participating on pension soundness workgroup	

California Public Employees' Retirement System				Agenda Item 3c – Attachment 1
Enterprise Risk Management - Residual Risk Report				
Investments	Owner	Current State	Mitigation Strategies	Completion Date
Investment Policy				
The Total Fund is invested consistent with the approved asset allocation policy targets and ranges and all other policy parameters.	Chief Investment Officer	Investment policies are in place for asset classes and Total Fund but independent review and monitoring is limited.	Risks reviewed by Asset Allocation / Risk Unit prior to policy approval Improved systems for compliance monitoring Establish well-defined roles, clearly defined end-to-end process, and improved systems	June 2012
Active Risk				
Active risk is measured by expected and realized volatility of portfolio returns compared to benchmark returns for the Total Fund and asset classes. Active risk is within established limits.	Chief Investment Officer	Risk budgeting is currently performed, but only at the Total Fund level.	Extend risk budgeting to asset classes	June 2012
Concentration				
Total Fund concentrations across asset classes including industry, country, currency and security asset type comparing portfolio and benchmark weights to identify significant active weights.	Chief Investment Officer	Concentrations are reported across asset classes relative to benchmarks.	Enhance analysis to include forecast risks associated with concentrated positions Provide more timely information to aggregate positions across asset classes	June 2012
Leverage				
Each asset class is in compliance with leverage policies and impact of portfolio leverage is understood.	Chief Investment Officer	Program leverage limits are monitored and reported as part of quarterly investment risk report. In addition to this compliance check, analysis of resulting risk implications could provide added value.	Evaluate impact on program and extal Fund risk of the use of leverage	June 2012
Counterparty Exposure				
Ability of counterparties to meet their contractual obligations is measured and managed.	Chief Investment Officer	Counterparty credit quality is currently monitored. Related filled in credit exposures are not captured.	Develop c bility to produce reports containing both derivative counterparty exposure and fixed income dit exposure	June 2012
Investment Risk Management				
Measurement, management, monitoring and reporting of investment risk and returns. Includes adequacy of resources, tools and governance structure to measure and manage risk.	Chief Investment Officer	See trisk system is and and trionsiste. Framework for investment decisions ex	Enhance Investment Office systems and controls Establish comprehensive Investment Office risk management system and practices	June 2012
Liquidity				
Projected amount of liquidity relative to anticipated requirements and ability to fund current requirements without resorting to premature asset sales.	Chief Investment Officer	Investment h for Lasts regularly prepared. Liquidity asset class being implement.	Fully implement the liquidity asset class	July 2011
Investment Controls				
Investment control framework in place to effectively manage risk, minimize fund expenses, provide for safekeeping of assets, and operate fund within context of all relevant legal requirements.	Chief Operating Investment Officer	Investment Office wide governance structure for operating risk has been developed but not fully implemented.	Implement new internal equity portfolio construction system and consolidated investment book of record Transition to new service model with master custodian Implement new travel policy, enhance restricted trading policy process, and train staff Complete financial reporting reengineering project Implement operating event measurement and escalation processes	June 2012
Investment Technology Systems				
Investment technology systems reliably provide accurate, relevant data in a secure manner and support the operations and accounting for investment funds.	Chief Operating Investment Officer	In-depth evaluation of systems completed. Custodial bank contract awarded. Data integrity and system integration could be improved. Improved timeliness, reliability, and quality of data necessary to support capital allocation decisions and performance monitoring.	Implement new equity portfolio construction system and consolidated book of record Implement new book of record for public assets Develop books of record strategy for private assets Implement risk management IT solution Establish Investment Office data control system	June 2012